

JUN 7 2012

Federal Communications Commission
Office of the Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In re)	
)	
MARITIME COMMUNICATIONS/LAND)	EB Docket No. 11-71
MOBILE, LLC)	File No. EB-09-IH-1751
)	FRN: 0013587779
Participant in Auction No. 61 and Licensee of)	
Various Authorizations in the Wireless Radio)	
Services)	
)	
Applicant for Modification of Various)	Application File Nos 0004030479,
Authorizations in the Wireless Radio Services)	0004144435, 0004193028, 0004193328,
)	0004354053, 0004309872, 0004310060,
Applicant with ENCANA OIL AND GAS (USA),)	0004314903, 0004315013, 0004430505,
INC.; DUQUESNE LIGHT COMPANY; DCP)	0004417199, 0004419431, 0004422320,
MIDSTREAM, LP; JACKSON COUNTY)	0004422329, 0004507921, 0004153701,
RURAL MEMBERSHIP ELECTRIC)	0004526264, 0004636537,
COOPERATIVE; PUGET SOUND ENERGY,)	and 0004604962
INC.; ENBRIDGE ENERGY COMPANY,)	
INC.; INTERSTATE POWER AND LIGHT)	
COMPANY; WISCONSIN POWER AND)	
LIGHT COMPANY; DIXIE ELECTRIC)	
MEMBERSHIP CORPORATION, INC.;)	
ATLAS PIPELINE – MID CONTINENT, LLC;)	
DENTON COUNTY ELECTRIC)	
COOPERATIVE, INC. DBA COSERV)	
ELECTRIC; AND SOUTHERN CALIFORNIA)	
REGIONAL RAIL AUTHORITY)	

To: Warren C. Havens, Environmentel, LLC, Intelligent Transportation & Monitoring Wireless, LLC, Skybridge Spectrum Foundation, Telesaurus Holdings GB, LLC, Verde Systems, LLC, and VG2 LLC (collectively, "SkyTel").

**ENFORCEMENT BUREAU'S FIRST SET OF REQUESTS FOR THE PRODUCTION
OF DOCUMENTS TO SKYTEL**

1. The Enforcement Bureau ("Bureau"), pursuant to Section 1.325 of the Commission's rules, 47 C.F.R. § 1.325, hereby requests that Skytel produce the Documents, as defined and specified herein, and deliver the Documents to the offices of the Investigations and Hearings

No. of Copies rec'd 041
List ABCDE

DIVISION, Enforcement Bureau, Suite 4-C330, 445 12th Street, S.W., Washington, DC 20554 (or at some other location that is mutually acceptable to the Bureau and SkyTel in the form specified within ten (10) days of the date of this Document Request, or within such timeframe as the Bureau and Skytel may agree to

Definitions

- a. As used herein, the term “you” or “your” or the collective term “SkyTel” means Environmental, LLC, Intelligent Transportation & Monitoring Wireless, LLC, Skybridge Spectrum Foundation, Telesaurus Holdings GB, LLC, Verde Systems, LLC, and VG2 LLC, including all other persons acting or purporting to act on their behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.
- b. “Act” shall mean the Communications Act of 1934, as amended.
- c. “Commission” or “FCC” shall mean the Federal Communications Commission.
- d. The terms/phrases “referring to,” “relating to” and/or “concerning,” as used herein, shall be interpreted broadly and shall include, but not be limited to, the following meanings: constituting, comprising, evidencing, reflecting, respecting, discussing, referring to, stating, describing, recording, noting, considering, embodying, evaluating, analyzing, mentioning, containing, concerning, regarding, indicating, pertaining to, showing, bearing upon, studying, memorializing, or commenting upon, or any other term synonymous with or similar to the foregoing.

e. “State” and “describe” mean to set forth a complete and detailed statement of all information, circumstances and facts that refer to, relate to, reflect, comprise or bear upon the matter concerning which information is requested.

f. The terms “identify” and “identification” when used in reference to an individual person mean to state his full name, residence and business telephone numbers, and present residence and business addresses if known, and his present or last known title, position and business affiliation.

g. The terms “identify” and “identification” when used in reference to a person other than a natural person mean to state the full and official name of the business entity, its principal place of business, and the main telephone number of such business entity.

h. The terms “identify” and “identification” when used in reference to a document mean to state its date, type (e.g., memo, telecopy, email), and its authors, addressees, title, if any, and, if no title, a brief description of the subject matter of the document and its present or last known location and custodian. If any document once was, but is no longer, in your possession, custody, or control, state what disposition was made of it and the reason for such disposition.

i. The terms “identify” and “identification” when used in reference to any act, activity, practice, policy, effort, event, transaction, negotiation, discussion, conversation, occasion, occurrence, meeting, representation, agreement or communication, mean to: (a) describe the nature and substance of the act, activity, practice, policy, effort, event, transaction, negotiation, discussion, conversation, occasion, occurrence, meeting, representation, agreement or communication; (b) state the date when and place where it occurred; and (c) identify each person who was a participant therein.

j. The term “and” also means “or” and the term “or” also means “and.”

k. The term “each” also means “every” and the term “every” also means “each.”

l. The term “all” also means “any” and the term “any” also means “all.”

m. The term “identify” when used with reference to a person or persons, means to state his or her full name; last known business and residence addresses; and last known business and residence telephone numbers

n. The term "Document" means the complete original (or in lieu thereof, exact copies of the original) and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any taped, recorded, transcribed, written, typed, printed, filmed, videotaped, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated, or made, including but not limited to any book, pamphlet, periodical, contract, agreement, correspondence, letter, facsimile, e-mail, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, photograph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minutes, marketing plan, research paper, preliminary drafts, or versions of all of the above, and computer material (print-outs, cards, magnetic or electronic tapes, disks and such codes or instructions as will transform such computer materials into easily understandable form) in the possession, custody, or control of Maritime.

o. “Discussion” means any assembly, congregation, encounter, meeting or conversation between or among two or more individuals for any purpose, whether or not planned, arranged, or scheduled in advance “Discussion” includes, without limitation, all oral communications, whether or not in person, by telephone (including voicemails and similar recordings), or otherwise, and electronic communications (including emails) between two or more individuals.

p. “Communication” means any discussion or any written or electronic correspondence or recorded voice message of any kind.

q. “Employee” means any director, trustee, officer, employee, partner, corporate parent, subsidiary, affiliate or servant of the designated entity, whether active or retired, full-time or part-time, current or former, and compensated or not.

r. “Representative” means any consultant, expert, attorney, contractor or other individual or entity engaged by the designated entity to perform some task or assignment for the entity.

s. “Entity” means any corporation, company, partnership, proprietorship, joint venture, or business, as well as any governmental unit.

t. “Person” means any natural person or legal entity, including but not limited to any corporation, partnership, proprietorship, firm, trust, association, government entity, organization, or group of persons.

u. “Site-based Authorizations” shall mean each authorization identified in Attachment A to *Muritime Communications/Land Mobile, LLC*, Order to Show Cause, Hearing Designation Order, and Notice of Opportunity for Hearing, EB Docket No. 11-71, FCC-11-64, rel. April 19, 2011 (“HDO”) except authorizations WQGF315, WQGF316; WQGF317; and WQGF318.

v. “Mobex” shall mean Mobex Network Services, LLC and any predecessor-in-interest, affiliate, parent company, wholly or partially owned subsidiary, other affiliated company or business, and all owners, including but not limited to, partners or principals, and all members, directors, officers, employees, managers or agents, including consultants and any other persons working for or on behalf of the foregoing at any time during the period January 1, 2002 through the present.

w. “Maritime” or “Maritime Communications/Land Mobile, LLC ” means “Maritime Communications/Land Mobile, LLC,” including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing. For purposes of this definition, “affiliate” shall include, but not be limited to, Donald R. DePriest.

Instructions

- a. The singular of a term includes the plural number and vice versa, any use of gender includes both genders, and a verb tense includes all other verb tenses where the clear meaning is not distorted by addition of another tense or tenses.
- b. Unless otherwise specified, supply all annual data requested on a calendar-year basis; if any basis other than a calendar-year basis is used, such as to accommodate a fiscal-year basis, state as part of the response the nature and type of the basis so used.
- c Unless otherwise specified, supply all information requested for the period January 1, 2000 through the present.

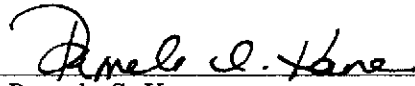
DOCUMENTS REQUESTED

1. All Documents that have been stored at Nation’s Capital Archive Storage Systems, Inc., located at 14811 Farm Creek Drive, Woodbridge, Virginia, 22191, and that Skytel received or is to receive pursuant to a subpoena issued in *Skybridge Spectrum Foundation, et al v. Mobex Network Services, et al.* (Civil Action No 2:11-CV-000993).

2. All Documents, including those reflecting the opinion of a consultant or an expert witness hired by Skytel or by others, and including but not limited to expert witness reports, materials or testimony, identifying a monetary valuation of the Site-based Authorizations that Maritime acquired from Mobex.
3. All Documents, including those reflecting the opinion of a consultant or an expert witness hired by Skytel or by others, and including but not limited to expert witness reports, materials or testimony, identifying a monetary valuation of the geographic licenses that Maritime acquired in Auction No. 61, namely, WQGF315, WQGF316, WQGF317, and WQGF318.
4. Documents sufficient to show that Maritime did not construct or place in operation its site-based facilities in accordance with Section 80.49(a) of the Commission's rules within two years of grant.
5. Documents sufficient to show that Maritime discontinued the operation of any of its site-based facilities.
6. Documents sufficient to show how long the operations of any Maritime site-based facilities have been discontinued.
7. Documents sufficient to show why operations of any Maritime site-based facilities have been discontinued.

Respectfully submitted,

P Michele Ellison
Chief, Enforcement Bureau

A handwritten signature in dark ink, appearing to read "Pamela S. Kane", is written over a horizontal line.

Pamela S. Kane
Deputy Chief
Investigations and Hearings Division
Enforcement Bureau

Brian J. Carter
Attorney
Investigations and Hearings Division
Enforcement Bureau

Federal Communications Commission
445 12th Street SW
Room 4-C330
Washington, D.C. 20554
(202) 418-1420

June 7, 2012

CERTIFICATE OF SERVICE

Makia Day, an Enforcement Analyst in the Enforcement Bureau's Investigations and Hearings Division, certifies that she has on this 7th day of June, 2012, sent by first class United States mail, copies of the foregoing "Enforcement Bureau's First Set of Requests For The Production of Documents To Skytel" to:

The Honorable Richard L. Sippel
Chief Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554 (by hand, courtesy copy)

Sandra DePriest
Maritime Communications/Land Mobile LLC
218 North Lee Street
Suite 318
Alexandria, Virginia 22314

Dennis C. Brown
8124 Cooke Court
Suite 201
Manassas, VA 20109
Counsel for Maritime Communications/Land Mobile LLC

Jeffrey L. Sheldon
Fish & Richardson P.C.
1425 K Street, N.W.
11th Floor
Washington, D.C. 20005
Counsel for Puget Sound Energy, Inc

Robert J. Miller
Gardere Wynne Sewell LLP
1601 Elm Street
Suite 3000
Dallas, Texas 75201
Counsel for Denton County Electric Cooperative, Inc. d/b/a CoServ Electric

Jack Richards
Wesley Wright
Keller & Heckman LLP
1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001

Counsel for Atlas Pipeline – Mid Continent LLC; DCP Midstream, LP; Enbridge Energy Co., Inc.; EnCana Oil and Gas (USA), Inc.; and Jackson County Rural Membership Electric Cooperative

Charles A. Zdebski
Gerit F. Hull
Eckert Seamans Cherin & Mellott, LLC
1717 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Counsel for Duquesne Light Co.

Paul J. Feldman
Harry F. Cole
Fletcher, Heald & Hildreth, P.L.C.
1300 N. 17th Street – 11th Floor
Arlington, VA 22209

Counsel for Southern California Regional Rail Authority

Matthew J. Plache
Albert J. Catalano
Catalano & Plache, PLLC
3221 M Street, N.W.
Washington, D.C. 20007

**Counsel for Dixie Electric Membership Corp.
Counsel for Pinnacle Wireless Corp.**

Robert J. Keller
Law Offices of Robert J. Keller, P.C.
P.O. Box 33428
Washington, D.C. 20033

Counsel for Maritime Communications/Land Mobile LLC

SkyTel
c/o ATLIS Wireless LLC
2509 Stuart Street
Berkeley, CA 94705
Attn: J. Stobaugh

Robert H Jackson
Marashlian & Donahue, LLC
The Comm Law Group
1420 Spring Hill Road
Suite 401
McLean, VA 22102



Makia Day